

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

BVG PROPERTIES, LLC, et al.,)	CASE NO.: 1:25:CV-00430
)	
)	
Plaintiffs,)	JUDGE PAMELA A. BARKER
)	
vs.)	
)	
CITY OF CLEVELAND, et al.,)	
)	
Defendants.)	

PLAINTIFFS' MOTION TO EXCEED PAGE LIMITATION

Now comes Plaintiffs, BVG Properties, LLC, 7006 Detroit LLC and 1415-1419 West 101 LLC, by and through the undersigned counsel, and respectfully requests this Honorable Court to grant Plaintiffs' Motion to Exceed Page Limitation. A memorandum in support is attached hereto.

Respectfully submitted,

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LOCAL RULE CERTIFICATION

This case has not been assigned to a specific track as of May 8, 2025. This Motion is filed in compliance with Local Rule 7.

/S/ SARAH S. GRAHAM
Sarah S. Graham, Esq. (0070850)

CERTIFICATE OF SERVICE

A copy of the foregoing Plaintiffs' Motion to Exceed Page Limitation was served via the Court's online filing system on May 8, 2025 to the following:

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MEMORANDUM IN SUPPORT

On April 28, 2025, Defendants City of Cleveland and Defendant Sally Martin aka Sally Martin O'Toole's ("Defendants") filed a Brief in Opposition to Plaintiffs BVG Properties, LLC, 7006 Detroit LLC and 1415-1419 West 101 LLC's ("Plaintiffs") Motion for Preliminary Injunction. Defendants' Brief in Opposition was 26 pages, almost none of which actually addressed the substantive claims and instead focused on jurisdiction.

Plaintiffs hereby request that this Court grant Plaintiffs' Motion to Exceed the Page Limitation. The page limitation is set forth in Local Rule 7.1(f). Plaintiffs submit that it is necessary to exceed the page limitation for reasons that include, but are not limited to, the fact that almost all of Defendant's Brief in Opposition addressed alleged jurisdiction issues and as such Plaintiffs need to be able to sufficiently address in detail the claims set forth in Defendants' Brief in Opposition as none were addressed in Plaintiffs' Motion for Preliminary Injunction or Plaintiffs' Supplemental Motion for Preliminary Injunction. Plaintiffs note that this Court had provided strict instructions as to what was to be included in the Plaintiffs' Supplemental Motion for Preliminary Injunction and that Plaintiffs were unable to address any anticipated jurisdictional claims by Defendants in their Supplemental Motion.

In light of the foregoing, Plaintiffs request that this Court grant its Motion for Extension of Page Limitation and allow Plaintiffs to file a Reply with the memorandum up to 30 pages in length.

/S/ SARAH S. GRAHAM
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Attorney for Plaintiffs